

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE MF GLOBAL HOLDINGS	:	
LIMITED SECURITIES LITIGATION	:	Civil Action No. 1:11-CV-07866-VM
THIS DOCUMENT RELATES TO:	:	
All Securities Actions	:	ECF CASE
(<i>DeAngelis v. Corzine</i>)	:	
	:	

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR
(I) PRELIMINARY APPROVAL OF PWC SETTLEMENT,
(II) CERTIFICATION OF THE PWC SETTLEMENT CLASS, AND
(III) APPROVAL OF NOTICE TO THE PWC SETTLEMENT CLASS**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement with Defendant PricewaterhouseCoopers LLP dated as of April 3, 2015 (the "PwC Stipulation")¹, attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiffs the Virginia Retirement System and Her Majesty The Queen In Right Of Alberta ("Lead Plaintiffs"), on behalf of themselves, the other named plaintiffs in the Action, and the other members of the PwC Settlement Class, hereby move this Court, under Rule 23 of the Federal Rules of Civil Procedure, for an order: (i) preliminarily approving the proposed PwC Settlement; (ii) certifying the proposed PwC Settlement Class, certifying Lead Plaintiffs as class representatives for the PwC Settlement Class, and appointing Co-Lead Counsel Bernstein Litowitz Berger & Grossmann LLP and Bleichmar Fonti Tountas & Auld LLP as class counsel for the PwC Settlement Class; (iii) approving the form and manner of giving notice of the proposed PwC Settlement and Co-Lead Counsel's motion for an award of attorneys' fees and

¹ All capitalized terms used herein shall have the meanings provided in the PwC Stipulation.

reimbursement of expenses to the PwC Settlement Class; and (iv) scheduling a hearing to consider final approval of the PwC Settlement, Co-Lead Counsel's motion for an award of attorneys' fees and reimbursement of expenses, and any other related matters. Attached hereto as Exhibit 2 is the [Proposed] Order Preliminarily Approving Proposed Settlement with Defendant PricewaterhouseCoopers LLP and Providing for Notice and its exhibits.

Dated: April 17, 2015
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ Salvatore J. Graziano

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- and -

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